

December 21, 2020
Deborah Cloots
7015 Birdsnest Way
Temple, TX 76502

FILED
U.S. BANKRUPTCY COURT
2020 DEC 23 PM 1:38
S.D. OF N.Y.

Judge Robert Drain
U.S. Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Dear Honorable Judge Drain,
I wanted to submit these documents
to show you when I originally approached
Edan Lisovitz with Akin Gump Strauss
Hauer & Feld LLP. When I spoke to
him he never said that it would
be a conflict of interest for him to hear
me. He did say say he couldn't give
me legal advice but then
did sway me in a direction. I
approached him on December 11 and
told him my plans to argue Crime
Fraud. He got back to me on the
14th and told me it hadn't come

up before. It was never mentioned to me that he and I talking might be a conflict of interest. On the 18 clearly after he knew my intent a bunch of stuff hit the docket. I also noticed some of our emails changed to look like they all took place on the 18th. I've attached copies of original emails along with my AT&T Call Logs that correspond with dates and times. I'm not a attorney so I don't know the implications of this. I just wanted you to have this info before making your decision.

Thank you

Deborah Clente

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Temple, TX 76502

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S.D. OF N.Y.

Judge Robert D. Drain
U.S. Bankruptcy Court
For the Southern District of New York
300 Quarropas Street
White Plains , New York 10601

In re Purdue Pharma L.P., et all

Case No. 19-23649 (RDD)

United States Bankruptcy for the Southern District of New York

Dear Honorable Judge Drain,

AMENDED MOTION FOR LIFT OF AUTOMATIC STAY

1. Your Honor the Claims No. 10231, Claim No. 67036, Claim No. 614341 and Claim No. 615270 is a debt obtained by the Debtors with their aggressive, fraudulent behavior which they eagerly plead guilty to and avoided prison time in a United States Federal Court Room. I would not be here today without the fraud committed by Purdue Pharma, LLP and the devastating toll it's taken on my life. The facts of the case that we now know, the far reaching and destructive effects of their actions force me today to invoke the Crime-Fraud Exception as described in bankruptcy code under Section 523(a)(2)(A), which provides that a debtor may not discharge debts incurred as a result of fraud and may not obtain a discharge as a result of fraud. I believe when the law of the bankruptcy code as set forth in the Bankruptcy Reform Act 1994 is applied, this debt should be deemed non-dischargeable, due and payable in full.
2. Purdue Pharma, LLP plead guilty dating back to 2007 defrauding the United States Government
3. Plead guilty to Dual-Object Conspiracy to Violate the Food and Drug and Cosmetic Act
4. Plead guilty to violating Anti-Kickback Statute.
5. In Docket 1753 an order granting the UCC the right to see privileged documents, based on good cause, crime fraud was issued.
6. I'm seeking damages of \$7,000,000.00. as per the claims

Thank you in advance,
Sincerely,

Deborah Clonts

Back to usage

Data, text & talk logs

Edward Fredrick | 254.410.3637

Device: Edward Fredrick Rodi | 254.410.3637

Billing period: Nov 29, 2020 - Present

Showing details for Talk usage

Totals for this billing period: 104 calls 575 minutes \$0.00

Date / Time	Contact	Location	Call Type	Minutes	Charge (\$)
12/21/2020 08:08AM	844.217.0912865	Toll Free	DT	1	0.00
12/20/2020 02:03PM	254.228.9900	INCOMING	NW	7	0.00
12/18/2020 03:37PM	973.477.2085	INCOMING	DT	3	0.00
12/18/2020 07:52AM	254.654.0617	INCOMING	DT	7	0.00
12/17/2020 05:08PM	254.228.9900	TEMPLE	DT	4	0.00
12/17/2020 01:57PM	254.913.5824	TEMPLE	DT	19	0.00
12/17/2020 01:46PM	713.728.6360	HOUSTON	DT	9	0.00
12/17/2020 01:23PM	877.413.6454	Toll Free	DT	9	0.00
12/17/2020 01:12PM	254.913.5824	TEMPLE	DT	1	0.00
12/17/2020 09:32AM	254.317.6707	KILLEEN	DT	1	0.00
12/17/2020 08:43AM	866.334.3141	Toll Free	DT	5	0.00
12/16/2020 04:12PM	254.228.9900	TEMPLE	DT	12	0.00
12/16/2020 01:10PM	254.724.2111	INCOMING	DT	1	0.00
12/15/2020 03:06PM	254.654.0617	INCOMING	DT	3	0.00
12/15/2020 01:20PM	254.228.9900	INCOMING	DT	4	0.00
12/15/2020 09:46AM	844.992.4726	Toll Free	DT	29	0.00
12/15/2020 09:43AM	844.992.4726	Toll Free	DT	3	0.00
12/15/2020 09:34AM	844.992.4726	Toll Free	DT	10	0.00
12/15/2020 09:32AM	310.342.0888	INGLEWOOD	DT	1	0.00
12/15/2020 09:00AM	844.992.4726	Toll Free	DT	33	0.00
12/15/2020 07:10AM	254.228.9900	INCOMING	DT	25	0.00
12/14/2020 06:41PM	973.477.2085	INCOMING	DT	9	0.00
12/14/2020 01:49PM	254.913.5824	TEMPLE	DT	1	0.00

Date / Time	Contact	Location	Call Type	Minutes	Charge (\$)
12/06/2020 07:30PM	254.228.9900	INCOMING	NW	1	0.00
12/06/2020 05:26PM	254.228.9900	TEMPLE	NW	14	0.00
12/04/2020 04:07PM	512.324.1000	AUSTIN	DT	7	0.00
12/04/2020 09:51AM	254.228.9900	INCOMING	DT	7	0.00
12/04/2020 09:46AM	254.654.0617	INCOMING	DT	6	0.00
12/04/2020 08:54AM	254.654.0617	CALL WAIT	CW	2	0.00
12/04/2020 08:54AM	254.654.0617	TEMPLE	DT	1	0.00
12/04/2020 08:34AM	254.913.5824	INCOMING	DT	18	0.00
12/03/2020 03:50PM	973.477.2085	INCOMING	DT	21	0.00
12/03/2020 02:40PM	800.924.9206	Toll Free	DT	6	0.00
12/03/2020 01:17PM	254.724.2111	TEMPLE	DT	1	0.00
12/03/2020 01:06PM	347.260.3092	BKLYN NYC	DT	3	0.00
12/03/2020 01:05PM	347.260.3092	INCOMING	DT	2	0.00
12/03/2020 01:00PM	347.260.3092	INCOMING	DT	5	0.00
12/03/2020 09:22AM	254.317.6707	INCOMING	DT	1	0.00
12/03/2020 08:09AM	254.709.1115	WACO	DT	1	0.00
12/02/2020 03:57PM	254.228.9900	TEMPLE	DT	9	0.00
12/02/2020 03:00PM	254.724.2111	TEMPLE	DT	7	0.00
12/02/2020 12:52PM	800.924.9206	Toll Free	DT	10	0.00
12/02/2020 11:09AM	254.724.2111	INCOMING	DT	2	0.00
12/02/2020 07:29AM	254.228.9900	INCOMING	DT	12	0.00
12/01/2020 04:22PM	254.773.0033	TEMPLE	DT	1	0.00
12/01/2020 01:15PM	254.340.1567	WACO	DT	9	0.00
12/01/2020 09:02AM	254.340.1567	WACO	DT	1	0.00
11/30/2020 08:41AM	254.724.2111	TEMPLE	DT	2	0.00
11/30/2020 08:23AM	254.724.2111	TEMPLE	DT	15	0.00
11/29/2020 02:54PM	254.228.9900	TEMPLE	NW	12	0.00

Legend*:

B (Direct assistance call complete); C (Call waiting); CW (Call waiting); D (Data call); d (Directory assistance); DT (Daytime minutes); F (Call forwarding); g (Push to talk group event); H (Group mobile-to-mobile calls); I (Incoming call); K (Fax call); L (Expanded calling); M (Mobile-to-mobile discount); M2AM (Mobile to any mobile); M2AN (A-list); M2MCNG (Mobile to any AT&T mobile); MCELL (MicroCell® unlimited voice); N (Night minutes or off-network); NW (Night & Weekend minutes); O (Off-peak minutes); P (Peak minutes or priority access service); PVWIFI (Wi-Fi calling); R (Roam with home); S (Shared minutes); SPWIFI (NumberSync Wi-Fi); T (Three way calling); V (V-VPN or voice activated dialing); VC (Video calling); VM (Voicemail); W (Weekend minutes); Y (Voicemail return call); 1 (PTT one-to-one event); 9 (Unity / expanded calling)

* The codes shown in this legend are the codes most commonly used with Wireless service from AT&T. Additional codes may be present.

Incoming Call Outgoing Call

GE Moneybank
GEICO 2
Genealogy
Groovebook 1
Groupon
Gym
Heart-Transpl...
Helping Hands
Higher One
Honey Dos
hotel 1
Houses 2
Innoken
Instacart
Insurance 1
Insurance Qu...
Isaboo
JC Penneys 5
Juvederm
Kodak
Lab results
Lawsuits & Settl... 2
Lovesac
LSCC 1
LVAD
magellan RX
Marij
Martin Harry ...
Mazy
Medical Resu...
Medicare Ad...
Medicare Ben...
MetLife
Mom
Motorcycle
MS Office
MyFico
Necklace
New York
NFT
Nordstrom
Notes
Officemax 2
Old Navy 13
Ollo
omega

Best,

Edan

Edan Lisovicz

AKIN GUMP STRAUSS HAUER & FELD LLP

Direct: (212) 377-9505 | Internal: 38105

From: Debbie Rodi <[REDACTED]>

Sent: Friday, December 11, 2020 5:33 PM

To: Lisovicz, Edan <elisovicz@akingump.com>

Subject: Quick question

****EXTERNAL Email****

Hi Edan,

I spoke with you last week and I have a quick question.

I noticed where Jim McClammey filed a motion today to stop all of the claim for payments without prejudice. I was going to argue that because my claim exists due to Purdue's fraud which they plead guilty to, I would ask the court to deem my claim non-dischargeable and due in full. If a debt is obtained fraudulently you can ask the court to do that, correct? Let me know.

Thank you.

Debbie Clonts

[Sent from Yahoo Mail for iPhone](#)

[Sent from Yahoo Mail for iPhone](#)

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[Reply](#), [Reply All](#) or [Forward](#)

- Bruce
- Buy Texas De...
- California
- Capital one 48
- Car
- Care Credit 6
- Casinos 24
- Charles Stanley 1
- Chase 13
- Chicago 20
- Christmas 3
- Christmas ide...
- Church
- Church
- Cinnemark
- Class Action
- Contacts
- Coupons 25
- Craigslist 11
- Credit 5
- CTU 9
- Dave and Arn...
- Death Cert Pat
- Dentist
- Dillard's 4
- Dionne
- Discover Card 2
- Documents
- Drafts
- DWI 6
- Ebay
- ED
- Eds Will
- Elephant
- Estate Sale
- Facebook
- Facebook ads
- Family
- Family Photos
- Favor
- FedEx
- Fitbit
- FLORIDA
- Freedom Mor...
- Freshly
- Fundraising 6



Debbie Rodi <dscclonts@yahoo.com>
To: Debbie Clonts Rodi

Sun, Dec 20 at 7:29 AM

[Sent from Yahoo Mail for iPhone](#)

Begin forwarded message:

On Monday, December 14, 2020, 5:46 PM, Lisovicz, Edan <elisovicz@akingump.com> wrote:

Hide original message

Ok thanks Debbie I will call you at 7:30 ET if that works.

Edan Lisovicz
AKIN GUMP STRAUSS HAUER & FELD LLP
Direct: +1 212.872.8105 | Internal: 38105

On Dec 14, 2020, at 2:40 PM, Debbie Rodi <dscclonts@yahoo.com> wrote:

Edan,
This evening will work better for me. I look forward to hearing from you.

Debbie

[Sent from Yahoo Mail for iPhone](#)

On Monday, December 14, 2020, 1:37 PM, Lisovicz, Edan <elisovicz@akingump.com> wrote:

Thanks Debbie. I have a busy afternoon today but can I call you this evening or tomorrow?

Edan Lisovicz
AKIN GUMP STRAUSS HAUER & FELD LLP
Direct: +1 212.872.8105 | Internal: 38105

From: Debbie Rodi <dscclonts@yahoo.com>
Sent: Monday, December 14, 2020 2:21 PM
To: Lisovicz, Edan <elisovicz@akingump.com>
Subject: Re: Quick question

I apologize. I neglected to mention my phone number in case you no longer have it. I can be reached at (254) 410-3637.

[Sent from Yahoo Mail for iPhone](#)

On Monday, December 14, 2020, 12:59 PM, Debbie Rodi <dscclonts@yahoo.com> wrote:

Yes. Whenever is convenient for you.

[Sent from Yahoo Mail for iPhone](#)

On Monday, December 14, 2020, 12:41 PM, Lisovicz, Edan <elisovicz@akingump.com> wrote:

Hi Debbie,

Apologies for the delayed response. It's a good question that you raise, and I don't have a simple answer for you. Are you available to discuss over the phone?

THIS CERTIFIES THAT A COPY WAS MAILED USPS TO
MARSHALL S HUEBNER
DAVIS POLK & WARDWELL LLP
450 LEXINGTON AVENUE
NEW YORK, NY 10017